

Arent Fox

February 11, 2011

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: CPNI Certification, EB 06-36

Dear Ms. Dortch:

On behalf of Vodacode, LLC enclosed please find the company's annual CPNI certification for filing in the above-referenced docket. Please contact me at (202) 857-6104 if you have any questions regarding this filing.

Respectfully submitted,

/s/

Katherine E. Barker Marshall

Attachment

cc: Best Copy and Printing (via e-mail)

Katherine E. Barker Marshall

Attorney

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010.

1. Date filed: February 11, 2011
2. Name of company(s) covered by this certification: Vodacode, LLC
3. Form 499 Filer ID: 828013
4. Name of signatory: Carolyn Malone
5. Title of signatory: Secretary and Treasurer
6. Certification:

I, Carolyn Malone certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

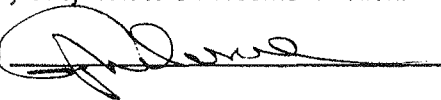
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

Vodacode, LLC
Statement of CPNI Operating Procedures

Vodacode, LLC (“Vodacode”) provides international termination of minutes. Vodacode has established policies and procedures to comply with the Federal Communications Commission’s (“FCC’s”) rules regarding the use, disclosure, and access to §64.2001 *et seq.* of the Commission’s rules, 47 C.F.R. §64.2001 *et seq.* These procedures ensure that Vodacode is in compliance with the FCC’s customer proprietary network information (“CPNI”) rules. This statement is a summary of Vodacode’s policies and procedures designed to safeguard CPNI.

Vodacode has substantial processes and control for both physical security and access to data. Its customers are provided services under contracts with express confidentiality provisions, verification methods to confirm the identity of customer’s authorized persons to receive the customer’s CPNI, and have dedicated account representative with access to customer data. Vodacode does maintain and utilize CPNI for the limited purposes of initiating, rendering, billing and collecting of its services, and may use CPNI, if necessary, to protect its property rights. Vodacode does not use any CPNI for any marketing purposes, nor does Vodacode disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Vodacode has implemented measures to discover and to protect against unauthorized attempts to access CPNI. Vodacode has also implemented measures to discover and to protect against unauthorized attempts to access CPNI. Vodacode also has implemented procedures pursuant to which it will track breaches of CPNI, and it will notify the United States Secret Service and the Federal Bureau of Investigation. Vodacode will notify its customers of the security breach, if permitted, and will notify of the breaches and notifications for a two-year period. Vodacode will track customer complaints regarding CPNI.

Vodacode will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.